

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING

In re)
CLICKED AI,)
Debtor.) Case No. 24-20226
) Chapter 11
)
)
)

MOTION FOR EXPEDITED HEARING ON DEBTOR'S EXPEDITED MOTION FOR
ENTRY OF ORDER AUTHORIZING USE OF CASH COLLATERAL PURSUANT TO
SECTIONS 361 AND 363

Pursuant to Local Rule 2081-1, Debtor Clicked AI, a Wyoming corporation, by and through undersigned counsel, respectfully moves the Court for an expedited hearing on Debtor's "Expedited Motion for Entry Of Order Authorizing Use Of Cash Collateral Pursuant to Sections 361 and 363." The grounds for this motion are as follows:

On June 13, 2024, Debtor filed its petition for relief under chapter 11, subchapter V of the Bankruptcy Code. On June 16, 2024, secured creditor Amazon Capital Services, Inc. dba Amazon Lending froze Debtor's "Seller Account" with Amazon. *See* Declaration of Kenny Lok in Support of Motion Authorizing Use of Cash Collateral ("Lok Declaration."), ¶¶6-7. As of June 16, 2024, Amazon Lending, through one or more of its affiliates, Amazon.com, Inc. or Amazon Seller Services LLC (collectively, "Amazon"), is holding \$74,664.55 of Debtor's net sale proceeds as an "account level

reserve” and will not release it to Debtor. *Id.* Sales on Amazon’s platform account for virtually all of Debtor’s income, which historically averages approximately \$270,000 per month. Lok Declaration, ¶3.

On June 18, 2024, Debtor Clicked AI filed and served an “Expedited Motion For Entry Of Order Authorizing Use Of Cash Collateral Pursuant To Sections 361 And 363” (hereinafter, “Motion To Use Cash Collateral”).

Because the freeze of its account receivable with Amazon imminently threatens debtor’s ability to continue its business operations, Debtor requests that the Court set an expedited hearing with shortened notice pursuant to the court’s authority under 11 U.S.C. §105 and in accordance with Local Rule 2081-1.

Debtor request that the Court approve the following procedures: Debtor will serve the Motion to Use Cash Collateral and Proposed Order, the Lok Declaration and any order granting this motion and setting an expedited hearing by overnight delivery, facsimile or email to all parties on the creditor mailing matrix on or before 5:00 p.m. June 21, 2024. The Debtor will file a certificate of service within one business day of such service. As Debtor served the Motion To Use Cash Collateral on June 18, 2024 by email to all creditors, such additional notice of the hearing should give interested parties sufficient time to respond.

Respectfully submitted this 19th day of June, 2024.

/s/ Clark Stith

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CERTIFICATE OF SERVICE

This is to certify that on the 19th day of June, 2024, I served the within Debtor's Motion for Expedited Hearing On Expedited Motion for Entry of Order Authorizing Use of Cash Collateral Pursuant to Sections 361 and 363 on the Assistant United States Trustee by electronic service and by U.S. Mail to all creditors on the attached creditor mailing matrix and also by email to:

Amazon Capital Services, Inc.
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/s/ Clark Stith

Clark Stith, proposed Attorney for Clicked AI